

Attachment A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

MAR 17 2021

BENJAMIN JOSEPH CRISANTOS

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

Your full name

FEDERAL CIVIL RIGHTS
COMPLAINT
(BIVENS ACTION)

v.

Civil Action No.: 1:21cv39
(To be assigned by the Clerk of Court)

SIMS (OFFICER AT (USP) HAZELTON, W.V. 2019) ^{MARCH}
SANS (OFFICER AT (USP) HAZELTON, W.V. 2019) ^{MARCH}

TSK
MJA
MW

Enter above the full name of defendant(s) in this action

I. JURISDICTION

This is a civil action brought pursuant to Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971). The Court has jurisdiction over this action pursuant to Title 28 U.S.C. §§ 1331 and 2201.

II. PARTIES

In Item A below, place your full name, inmate number, place of detention, and complete mailing address in the space provided.

A. Name of Plaintiff: BENJAMIN JOSEPH CRISANTOS Inmate No.: 13665-030
Address: (USP) BIG SANDY / P.O BOX 2068 / INEZ, K.Y. -41224

In Item B below, place the full name of each defendant, his or her official position, place of employment, and address in the space provided.

Attachment A

B. Name of Defendant: SIMS (LAST NAME)
Position: OFFICER (FEDERAL EMPLOYEES) AT (USP) HAZELTON, W.V. (MARCH 2019)
Place of Employment: (USP) HAZELTON, W.V. (MARCH 2019)
Address: (USP) HAZELTON / 1640 SKY VIEW DRIVE /
BRUCETON MILLS, W.V. - 26525 (BEFORE 3/21/19)

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: DEFENDANT "SIMS" WAS AN EMPLOYEE
TO THE FEDERAL BUREAU OF PRISONS AT (USP) HAZELTON, W.V., WHICH IS A
FEDERAL INSTITUTION, WHEN THIS INCIDENT TOOK PLACE.

B.1 Name of Defendant: SANS (LAST NAME)
Position: OFFICER AT (USP) HAZELTON, W.V. (MARCH 2019)
Place of Employment: (USP) HAZELTON, W.V. (MARCH 21, 2019)
Address: (USP) HAZELTON / 1640 SKY VIEW DRIVE / BRUCETON MILLS, W.V.
(BEFORE 3/21/19) 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: DEFENDANT "SANS" WAS AN EMPLOYEE
TO THE FEDERAL BUREAU OF PRISONS AT (USP) HAZELTON, W.V. AT THE TIME THE
INCIDENT TOOK PLACE.

B.2 Name of Defendant: _____
Position: _____
Place of Employment: _____
Address: _____

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☐ Yes ☐ No

Attachment A

If your answer is "YES," briefly explain: _____

B.3 Name of Defendant: _____

Position: _____

Place of Employment: _____

Address: _____

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☐ Yes ☐ No

If your answer is "YES," briefly explain: _____

B.4 Name of Defendant: _____

Position: _____

Place of Employment: _____

Address: _____

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☐ Yes ☐ No

If your answer is "YES," briefly explain: _____

Attachment A

B.5 Name of Defendant: _____
Position: _____
Place of Employment: _____
Address: _____

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☐ Yes ☐ No

If your answer is "YES," briefly explain: _____

III. PLACE OF PRESENT CONFINEMENT

Name of Prison/ Institution: UNITED STATES PENITENTIARY (BIG SANDY)

A. Is this where the events concerning your complaint took place?
☐ Yes ☒ No

If you answered "NO," where did the events occur?

(UNITED STATES PENITENTIARY) HAZELTON, W.V

B. Is there a prisoner grievance procedure in the institution where the events occurred? ☒ Yes ☐ No

C. Did you file a grievance concerning the facts relating to this complaint in the prisoner grievance procedure?
☒ Yes ☐ No

D. If your answer is "NO," explain why not: _____

E. If your answer is "YES," identify the administrative grievance procedure number(s) in which the claims raised in this complaint were addressed

Attachment A

and state the result at level one, level two, and level three. **ATTACH GRIEVANCES AND RESPONSES:**

LEVEL 1 987206-F1/F2 - INFORMATIONAL PURPOSE (DO NOT HAVE COPY) (DATE RECEIVED: 8/13/19) STATUS DATE: 9/19/19
 LEVEL 2 987206-R1 - INFORMATIONAL - PURPOSE (DO NOT HAVE COPY) (DATE RECEIVED: 9/28/19) STATUS DATE: 11/5/19
 LEVEL 3 987206-A1 - INFORMATIONAL PURPOSES ONLY (ATTACHED) DATE RECEIVED: 1/27/20 STATUS DATE: 3/2020

IV. PREVIOUS LAWSUITS AND ADMINISTRATIVE REMEDIES

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action? ☐ Yes ☒ No
- B. If your answer is "YES", describe each lawsuit in the space below. If there is more than one lawsuit, describe additional lawsuits using the same format on a separate piece of paper which you should attach and label: "IV PREVIOUS LAWSUITS"

1. Parties to this previous lawsuit:

Plaintiff(s): N/A

Defendant(s): N/A

2. Court: N/A
 (If federal court, name the district; if state court, name the county)

3. Case Number: N/A

4. Basic Claim Made/Issues Raised: N/A

5. Name of Judge(s) to whom case was assigned: N/A

6. Disposition: N/A
 (For example, was the case dismissed? Appealed? Pending?)

7. Approximate date of filing lawsuit: N/A

(EXHAUSTED) BP-11 (EXHAUSTED) REMEDIES

U.S. Department of Justice

Central Office Administrative Remedy Appeal

Federal Bureau of Prisons

Type or use ball-point pen. If attachments are needed, submit four copies. One copy each of the completed BP-229(13) and BP-230(13), including any attachments must be submitted with this appeal.

From: CRISANTOS BENJAMIN J. 13665-030 B-4 USP (BIG SANDY)
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A - REASON FOR APPEAL PURSUANT TO MY CONSTITUTIONAL RIGHTS AS A PRISONER AND PROGRAM STATEMENT 3420.11. IM FILING THIS ADMINISTRATIVE REMEDY AGAINST TWO UNKNOWN NAMED OFFICERS WHO VIOLATED MY FEDERALLY PROTECTED RIGHTS AND SUBJECTED ME TO A MALICIOUS, BRUTAL CRIMINAL ASSAULT AND BATTERY UNDER THE COLOR OF LAW ON MARCH 21st, 2019. BE ADVISED THIS CRIMINAL ACT AND VIOLATION OF MY CONSTITUTIONAL RIGHTS, WAS TOTALLY UNPROVOKED AS I HAVE NEVER HAD ANY POSITIVE NOR NEGATIVE INTERACTION WITH EITHER OF THESE OFFICERS SINCE MY INCARCERATION AT THE PRISON (USP) HAZELTON, W.V. PLEASE KNOW, THAT IT HAS BEEN BLOWING MY MIND AS TO THE REASONS WHY I WAS SINGLED OUT FOR SUCH A BEAT DOWN WITHOUT PROVOCATION. IM TIRED OF THIS HAPPENING! THIS IS THE SECOND TIME THAT THIS HAS HAPPENED SINCE, AND AFTER, MY INCARCERATION, CRIMINAL OFFENSE AND CONVICTION, THAT I HAVE BEEN SUBJECTED TO "EXCESSIVE FORCE" AND "BRUTALITY BY LAW ENFORCEMENT OFFICERS AND GUARDS." ITS LIKE I HAVE A HIT ON ME BY OFFICERS!

RELIEF: I WANT THIS PROPERLY INVESTIGATED AND I WANT COMPENSATED FOR ALL PRESENT & FUTURE DAMAGES.

1/19/20
DATE

Benjamin Crisantos
SIGNATURE OF REQUESTER

Part B - RESPONSE

RECEIVED

JAN 27 2020

As of 1/27/20, the appeal is being processed in the following manner:

DATE

GENERAL COUNSEL

ORIGINAL: RETURN TO INMATE

CASE NUMBER: _____

Part C - RECEIPT

CASE NUMBER: 987206-A1

Return to: CRISANTOS BENJAMIN J. 13665-030 B-4 USP (BIG SANDY)
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: STAFF MISCONDUCT / SERIOUS ASSAULT

1/19/20

Benjamin Crisantos (SENT FIRST CLASS)

Administrative Remedy No. 987206-A1
Part B - Response

This is in response to your Central Office Administrative Remedy Appeal in which you allege staff misconduct. Specifically, you claim staff members assaulted you. For relief, you request an investigation and compensation.

We reviewed documentation relevant to your appeal and, based on the information gathered, concur with the manner in which the Warden and Regional Director addressed your concerns at the time of your Request for Administrative Remedy and subsequent appeal. Staff conduct is governed by Program Statement 3420.11, Standards of Employee Conduct, and the Bureau of Prisons takes seriously any allegation of staff misconduct, such as those you raised in this remedy cycle. We look into matters which may constitute inappropriate conduct and refer them to another component of the Bureau of Prisons for appropriate action. The matter has been forwarded to the appropriate Bureau component for further review.

Additionally, no inmate is entitled to be advised of the results of any inquiry or any action pursued against staff. You should also be aware such reviews may or may not include interviewing you and no inmate is entitled to be apprised of the progress, outcome, or disposition of any review of alleged staff misconduct. Similarly, any action taken against staff, if any are deemed necessary, will not be disclosed to you.

Lastly, regarding your request for compensation, Program Statement 1330.18, Administrative Remedy Program, does not provide such relief. There is a statutorily-mandated procedure in place for addressing such a request. Therefore, your request will not be considered in this response.

Based on the foregoing, this response is provided for informational purposes only.

3/16/20

Date

Jo

Ian Connors, Administrator
National Inmate Appeals

Attachment A

8. Approximate date of disposition. Attach Copies: N/A

C. Did you seek informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part B?

☐ Yes ☒ No

D. If your answer is "YES," briefly describe how relief was sought and the result. If your answer is "NO," explain why administrative relief was not sought.

N/A

E. Did you exhaust available administrative remedies?

☐ Yes ☒ No

F. If your answer is "YES," briefly explain the steps taken and attach proof of exhaustion. If your answer is "NO," briefly explain why administrative remedies were not exhausted.

NO, BECAUSE I HAVEN'T BROUGHT ANYTHING THAT HAS TO DO WITH THESE
FACTS TO ANY SORT OF COURTS, UNTIL NOW.

G. If you are requesting to proceed in this action *in forma pauperis* under 28 U.S.C. § 1915, list each civil action or appeal you filed in any court of the United States while you were incarcerated or detained in any facility that was dismissed as frivolous, malicious, or for failure to state a claim upon which relief may be granted. Describe each civil action or appeal. If there is more than one civil action or appeal, describe the additional civil actions or appeals using the same format on a separate sheet of paper which you should attach and label "G. PREVIOUSLY DISMISSED ACTIONS OR APPEALS"

1. Parties to previous lawsuit:

Attachment A

Plaintiff(s): n/aDefendant(s): n/a

2. Name and location of court and case number:

n/a3. Grounds for dismissal: ☐ frivolous ☐ malicious
☐ failure to state a claim upon which relief may be granted4. Approximate date of filing lawsuit: n/a5. Approximate date of disposition: n/a NEVER HAD ANY LAWSUIT DISMISSED BECAUSE
OF FRIVOLOUS, MALICIOUS OR FAILURE TO STATE A CLAIM
UPON WHICH RELIEF MAY BE GRANTED.V. STATEMENT OF CLAIM

State here, as **BRIEFLY** as possible, the facts of your case. Describe what each defendant did to violate your constitutional rights. **You must include allegations of specific wrongful conduct as to EACH and EVERY defendant in the complaint.** Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, you must number and set forth each claim in a separate paragraph. **UNRELATED CLAIMS MUST BE RAISED IN SEPARATE COMPLAINTS WITH ADDITIONAL FILING FEES. NO MORE THAN FIVE (5) TYPED OR TEN (10) NEATLY PRINTED PAGES MAY BE ATTACHED TO THIS COMPLAINT. (LR PL 3.4.4)**

-CLAIM 1: ON 3/21/19 GUARD "Sims" VIOLATED MY EIGHTH AMENDMENT, TO BE FREE FROM
LEVEL AND UNUSUAL PUNISHMENT, USING EXCESSIVE FORCE BY BRUTALLY ASSAULTING
ME IN A MALICIOUS, SABOTICALLY, WANTONLY KNOWING WAY.

Supporting Facts: ON 3/21/19 IN (USP) HAZELTON, W.V (UNIT E-1) I WAS ESCORTED

PAGE 1 OF 2

SUNDAY
3/14/21

(CLAIM #1 AND SUPPORTING FACTS CONTINUATION)

HAVING AN OFFICER TO MY LEFT AND ONE IN FRONT OF ME, THE ONE IN FRONT OF ME WAS THE TALKER, I WAS TOLD TO TAKE MY BEENIE OFF, I ABIDED AND HANDED HIM THE BEENIE TO HIM IN HIS LEFT HAND HE GRABBED IT AGGRESSIVELY AND BUNCHED IT UP IN HIS HAND RIGHT AFTER THAT HE STARTED YELLING, "I WAS ONLY GOING TO GIVE YOU A PAT DOWN AND I DONT CARE IF THAT YOU LOOKED AT OUR NAME TAGS AND YOU ARE BEING DISRESPECTFUL", I RESPONDED, "CAN YOU PLEASE LOWER YOUR TONE AND TALK TO ME HOW IM TALKING TO YOU AND IM NOT BEING DISRESPECTFUL", HE THEN GOT CLOSER AND IN A MENACING WAY SAID, "IF YOU WANT TO, GO AHEAD AND HIT ME", I RESPONDED, "IM NOT ~~AND~~ DUMB ENOUGH TO DO THAT" HE RESPONDED "YOU AINT _____" (PROFANITY USED) I RESPONDED THE SAME, HE THEN LOOKED AT THE OFFICER TO THE LEFT AND SAID "_____ IT" (PROFANITY USED) I QUICKLY LOOKED AT THE ONE TO THE LEFT AND TURNED BACK TO THE ONE IN FRONT OF ME, RIGHT AWAY I WAS HIT IN THE FACE BY THE ONE TO MY LEFT, I COVERED UP MY FACE AND STARTED GETTING PUNCHED FROM EVERYWHERE POSSIBLE BY BOTH OF THEM, I EVENTUALLY HIT THE FLOOR ON MY KNEE'S STILL COVERING MY FACE AND STILL GETTING PUNCHED, EVENTUALLY I STARTED GETTING KICKED THROUGH OUT MY BACK AS THE OTHER TOOK MY HANDS AWAY FROM MY FACE ~~AND~~ WITH ONE HAND HOLDING BOTH MY HANDS AND PUNCHING MY FACE WITH THE OTHER HAND AND THE OTHER OFFICER JOINED PUNCHING MY FACE THEN MY STOMACH AND ITS SIDES, I ENDED UP ~~B~~ WITH SWOLLEN SHUT EYES SO I COULDN'T SEE, BUT JUST HEAR ONE SAY, "CALL FOR BACK UP", AND THEY BOTH WERE WINDED OUT. I THEN GOT PUT ON A STRETCHER WHEN OTHER STAFF GOT ~~THERE~~ ^{THERE} EVENTUALLY I WAS SENT IN AN AMBULANCE TO THE EMERGENCY HOSPITAL DUE TO ~~THE~~ THE EXTENT OF MY INJURIES AND CONDITION.

Attachment A

BY OFFICERS SIMS AND SANS FROM THE TOP TIER TO THE UNIT TEAMS OFFICES HALLWAY (BETWEEN 7:45-8:30 PM) THE DOOR WAS OPENED AND RELOCKED AND I WAS THEN TAKEN TO STAFF'S RESTROOM, WHERE THERE'S NO CAMERAS, I WAS THEN TOLD TO GO TO THE CORNER OF THE RESTROOM, I WAS THEN CORNERED IN BY

CLAIM 2: ON 3/21/19 GUARD "SANS" VIOLATED MY EIGHTH AMENDMENT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, USING EXCESSIVE FORCE BY BRUTALLY ASSAULTING ME IN A MALICIOUS, SARCASTICALLY, WANTONLY KNOWING WAY

Supporting Facts: ON 3/21/19 AT (USP) HAZELTON, W.V (IN UNIT E-1) I WAS ESCORTED BY OFFICERS "SANS" AND "SIMS" FROM THE TOP TIER TO TO UNIT TEAM OFFICES HALLWAY (BETWEEN 7:45-8:30) THE DOOR WAS OPENED AND THEN RELOCKED BY THE OFFICERS, I WAS TAKEN TO STAFF'S RESTROOM, WHERE THERE'S NO CAMERAS, I WAS TOLD TO GO TO THE CORNER OF THE RESTROOM,

CLAIM 3:

Supporting Facts:

CLAIM 4:

Supporting Facts:

2 of 2

(CLAIM #2 AND SUPPORTING FACTS CONTINUATION)

SUNDAY
3/14/21

I WAS THEN CORNERED IN BY HAVING AN OFFICER TO MY LEFT SIDE AND ONE IN FRONT OF ME, THE ONE IN FRONT WAS THE TALKER, I WAS TOLD TO TAKE MY BEENIE OFF, I ABIDED AND HANDED HIM THE BEENIE IN HIS LEFT HAND (THE ONE IN FRONT) HE GRABBED IT AGGRESSIVELY AND BUNCHED IT UP IN HIS HAND, RIGHT AFTER THAT HE STARTED YELLING, "I WAS ONLY GOING TO GIVE YOU A PAT DOWN AND I DONT CARE THAT YOU LOOKED AT OUR NAME TAGS AND YOU'RE BEING DISRESPECTFUL", I RESPONDED, "CAN YOU PLEASE LOWER YOUR TONE AND TALK TO HOW IM TALKING TO YOU AND IM NOT BEING DISRESPECTFUL", HE THEN GOT CLOSER AND IN A MENACING WAY SAID, "IF YOU WANT TO, GO AHEAD AND HIT ME", MY RESPONSE "IM NOT DUMB ENOUGH TO DO THAT", HIS RESPONSE WAS "YOU AINT _____" (PROFANITY USED) I RESPONDED THE SAME, HE THEN LOOKED AT THE OFFICER TO MY LEFT SIDE AND SAID "_____ IT" (PROFANITY USED) I QUICKLY LOOKED AT THE OFFICER TO MY LEFT AND TURNED BACK TO THE OFFICER IN FRONT OF ME, RIGHT AWAY I WAS HIT IN THE FACE BY THE ONE TO MY LEFT, I COVERED UP MY FACE AND THEN STARTED GETTING PUNCHED FROM EVERYWHERE POSSIBLE BY BOTH OF THEM, I EVENTUALLY HIT THE FLOOR ON MY KNEES STILL COVERING MY FACE AS I WAS STILL GETTING PUNCHED, EVENTUALLY I STARTED GETTING KICKED THROUGH OUT MY BACK AS THE OTHER TOOK MY HANDS AWAY FROM MY FACE HOLDING THEM WITH ONE HAND AS HE USED HIS OTHER TO PUNCH MY FACE AND THE OTHER OFFICER ALSO STARTED PUNCHING MY FACE THEN MY STOMACH AND MY TIRES, I ENDED UP WITH SWOLLEN SHUT EYES SO I COULDN'T SEE, I JUST HEARD ONE SAY CALL FOR BACK UP AS THEY WERE BREATHING HEAVILY, OTHER STAFF CAME AND I WAS PUT ON A STRETCHER EVENTUALLY I WAS SENT IN AN AMBULANCE TO THE EMERGENCY HOSPITAL DUE TO THE EXTENT OF MY INJURIES AND CONDITION.

Attachment A

CLAIM 5:

Supporting Facts:

VI. INJURY

Describe **BRIEFLY** and **SPECIFICALLY** how you have been injured and the exact nature of your damages.

PHYSICALLY BROKEN 2ND LUMBAR VERTEBRA BY THE KICKS THROUGH OUT MY BACK WITH BOOTS, CAUSED EXTREME BACK PAINS I GOT TO PUT UP ^{WITH} EVERY SINGLE DAY OF MY LIFE, IBUPROFEN DOES NOT HELP IT MUCH, I CANT WORK OUT LIKE I USE TO AND THAT STRESSES ME OUT BECAUSE IN A WAY THAT WAS MY ESCAPE FROM EVERYDAY LIFE IN PRISON, I DO GET SAD AT TIMES BUT NOT TO THE FULL POINT OF DEPRESSION. ⁽²⁾ EYE SIGHT CAUSED BY THE MULTIPLE PUNCHES TO MY EYES TEMPLE AND HEAD - I SEE BRIGHT WHITE AND BLACK DOTS FLOATING AROUND I HAD BLOOD IN THE WHITE PART OF MY EYES MAKING THEM PURE BLOOD COLOR,

VII. RELIEF

State **BRIEFLY** and **EXACTLY** what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.

I WANT \$500,000 FROM EACH DEFENDANT. I WANT MONETARY DAMAGES, PUNITIVE DAMAGES. THE COST OF MY CIVIL ACTION COST. AND WHAT THE COURT DEEMS AN EXTRA COMPENSATION.

1 of 1

SUNDAY
3/14/21

VI. INJURY (CONTINUATION)

~~REMOVED~~, I SEE BRIGHT WHITE FLASHES OUT THE CORNER OF EACH EYE, I CONSTANTLY HAVE TO BE SQUINTING TO SEE EVEN WITH GLASSES ON AS IM WRITING THIS, MY EYES START HURTING WHEN READING AND WRITING, AND FOR UNKNOWN REASONS MY EYES GET VERY IRRITATED WITH LIGHT FROM OUTSIDE AND THE ONES INSIDE THE INSTITUTION.

A HERNIA TO MY UMBELICAL SHORTLY AFTER THE ASSUALT DEVELOPED. POSSIBLY THE PUNCHES TO MY SIDES AND STOMACH COULD OF CAUSED THIS - PAINS GET SO BAD I JUST WANT TO LAY DOWN MOST OF THE DAY, IT HURTS WHEN I TALK, COUGH, LAUGH, SNEEZE AND WHEN I SIT DOWN TO WRITE IN THE CELL DESK. (4) • STICHES AND SCARS - DUE TO THE REPEATING PUNCHES TO MY EYES AND FACE - I GOT STICHES ABOVE MY LEFT AND RIGHT EYELIDS AND STICHES ABOVE MY LIP. PARTIALLY CHIPPED TOOTH • POSSIBLY FROM A PUNCH OR FROM FACE BEING HIT AGAINST FLOOR. (6) • MY HEARING WAS IMPAIRED • FROM THE LEFT SIDE - POSSIBLY FROM THE PUNCHES TO MY HEAD FACE EARS, TEMPLE - IT ALMOST FEELS LIKE BEING UNDERWATER AND AT TIMES IT HURTS, MY HEARING IS BETTER WITH MY RIGHT THEN MY LEFT. (7) UNSPECIFIED RECTAL PAINS:

- ~~REMOVED~~ PSYCHOLOGICALLY / MENTALLY / EMOTIONALLY • EVER SINCE AFTER THE INCIDENT I KEEP MY DISTANCE FROM STAFF AND WHEN I DO GOT TO TALK TO THEM IS REAL HARD FOR ME TO CONCENTRATE AND I LOSE TRACK OF THINGS I WANTED TO ASK ABOUT IN THE FIRST PLACE, MY HEART STARTS PICKING UP AND I START THINKING THAT IN A WAY THEY MIGHT ~~BE~~ TRY TO DO SOMETHING TO ME. EVERYTIME I HEAR KEYS MY ATTENTION GOES TO THAT NO MATTER WHAT I MIGHT BE DOING, IT WAS HARD FOR ME TO GO TO SLEEP BECAUSE AT NIGHT WHEN I HEARD KEYS, C.O.'S BOOTS COMING UP THE STAIRS OR EVEN THEIR VOICES IT WOULD WAKE ME UP AND I'D STRUGGLE ALOT TO GO TO SLEEP SO ~~THE~~ THE DOCTOR PRESCRIBED ME MIRTAZAPINE 30 MG, THOUGH THAT DOES HELP TO SLEEP IT DOESNT HELP WITH THE NIGHTMARES I HAVE, AT TIMES IN MY NIGHTMARES ITS C.O.'S THAT WORK HERE THAT ARE ASSUALTING ME IT GETS TO THE POINT THAT WHEN I DO WAKE UP, DUE TO A NIGHTMARE, I FEEL REAL BAD PAIN THROUEN OUT MY BACK, HERNIA AND EVEN RECTAL AREA.

Attachment A

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is true and accurate. Title 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Executed at (USD) BIG SANDY / P.O. BOX 2068 / NEZKY on 3/14/21 (SUNDAY)
(Location) 41224 (Date)

Benjamin Crisantes
Your Signature